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April 27, 2022

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**RE: Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.;**  
**Docket No. R-2022-3031211**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum of the Columbia Industrial Intervenors ("CII") in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Charis Mincavage'.

Charis Mincavage  
MCNEES WALLACE & NURICK LLC

c: Christopher P. Pell, Deputy Chief Administrative Law Judge (via e-mail)  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2022-3031211
	:	
Columbia Gas of Pennsylvania, Inc.	:	

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**PREHEARING MEMORANDUM  
OF THE COLUMBIA INDUSTRIAL INTERVENORS**

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As requested by Deputy Chief Administrative Law Judge (“DCALJ”) Christopher P. Pell in the Prehearing Conference Order dated April 20, 2022, the Columbia Industrial Intervenors (“CII”) hereby submit this Prehearing Memorandum.

**I. HISTORY OF THE PROCEEDING**

On March 18, 2022, Columbia Gas of Pennsylvania, Inc. (“Columbia” or “Company”), filed with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) proposed Supplement No. 337 to Tariff Gas – Pa. P.U.C. No. 9 (“Supplement No. 337”), proposed to become effective on May 17, 2022. Through the filing, Columbia requested a general rate increase of approximately \$82.2 million over its present annual revenues.

On April 14, 2022, the Commission suspended Columbia’s proposed filing by operation of law until December 17, 2022, and instituted an investigation into the Company’s proposed Supplement No. 337.

Concurrent with the filing of this Prehearing Memorandum, CII is also filing a Complaint in this proceeding. A description of CII is set forth in Paragraph 5 of CII’s Complaint. A Prehearing Conference has been scheduled in this proceeding for April 29, 2022.

## **II. IDENTIFICATION OF LEAD ATTORNEY**

For purposes of the Prehearing Conference, Charis Mincavage will speak as the lead attorney on behalf of CII.

## **III. ANTICIPATED ISSUES AND SUB-ISSUES**

CII's preliminary review of the Company's filing indicates a need for Commission investigation into at least the following issues:

- a) Whether the size of the requested rate increase is appropriate;
- b) Whether the expenses claimed by Columbia were prudently incurred;
- c) Whether the allocation of the proposed increase among customer classes is just, reasonable and non-discriminatory;
- d) Whether the Return on Equity ("ROE") proposed by the Company results in a fair Rate of Return ("ROR");
- e) Whether the rate design and rate structure proposed by Columbia are appropriate; and
- f) Whether Columbia's claimed Cost of Service Study ("COSS") is accurate and legitimate.

CII anticipates pursuing these issues during this proceeding and reserves the right to raise further issues and to respond to all issues raised by other parties.

## **IV. PROPOSED WITNESS**

CII is in the process of evaluating whether it will sponsor testimony in this proceeding. In the event that CII decides to sponsor testimony, it will immediately inform the parties and the DCALJ of any intended witnesses and topics of testimony. CII also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

**V. PROPOSED SCHEDULE AND DISCOVERY RULES**

CII will cooperate with the DCALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission’s regulations and any directives issued by the DCALJ. Additionally, CII will defer to the other parties at the Prehearing Conference as to the need for public input hearings and the amount of hearing time needed.

**VI. POSSIBILITY OF SETTLEMENT**

CII is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By   
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Counsel to the Columbia Industrial Intervenors

Dated: April 27, 2022

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Charis Mincavage

Counsel to the Philadelphia Area Industrial  
Energy Users Group

Dated this 27<sup>th</sup> day of April, 2022, in Harrisburg, Pennsylvania